



# United States Department of the Interior

## BUREAU OF LAND MANAGEMENT

### WARM SPRINGS RESOURCE AREA

15 East 500 North  
Fillmore, Utah 84631



IN REPLY REFER TO:

3800  
UT055

May 10, 1991

Paul Buhanan  
P.O. Box 157  
Cedar City, UT 84720

Dear Mr. Buhanan:

Thank you for your letter of February 4, 1991 which detailed your Plan of Operations for the White Lady claim group. I apologize for the delay in responding to your plan but we have been trying to cope without our geologist for the past several weeks.

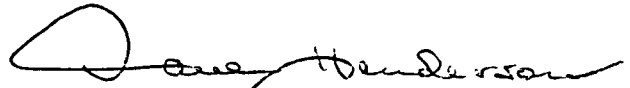
The environmental assessment (EA) on your plan of operations is in draft form and has been reviewed by our staff specialists. This review, however, pointed out several deficiencies in the EA that must be corrected. To do so I must have your assistance with the following information:

1. Please identify, by claim number, the precise claims you will be working in under this plan. It appears from the map that most of your disturbance is in UMC 139075 and 139066.
2. Please identify, by claim number, in as much detail as possible, how you intend to mine the ore. Will you be blasting? What type of mechanized equipment will you be using? Will you be doing any road work? How do you propose to reclaim disturbed areas? How will you haul out your ore? How much new disturbance do you anticipate? If you haul out a pickup load every "two or three weeks" how long will this phase of the operation last?
3. To establish grandfathered use we need documentation you may have, by claim number, showing the use that was occurring on each claim prior to October 21, 1976. You indicated that you had papers to document the manner and degree of your operations. We need specific information on the amount of disturbance made each year and the type of equipment used. It may also be helpful to send us copies of your proof of labor or information regarding Mr. Fehr's activities.

As soon as you are able to provide this information we will incorporate it into the EA. We are then required to provide a 30 day public comment period because the action occurs within a Wilderness Study Area. Depending on the level of public comment, I anticipate that we will be able to issue a final decision on your plan within 45 days of receipt of your response. Because of the sensitivity of the area I suggest you refrain from any activity on these claims until your plan is approved.

Please feel free to contact me at 743-6811 if you have any questions regarding this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Dave Henderson", written over a horizontal line.

Dave Henderson  
Area Manager

DH:cbf

1800  
JT033

February 28, 1991

Mr. Paul Buchanan  
P.O. Box 157  
Cedar City, Utah 84720

Dear Mr. Buchanan:

Thank you for your letter of February 4, 1991. Your letter addresses all of the requirements of a Plan of Operations under our regulations for mining within Wilderness Study Areas (WSAs). We have decided that we will process your letter as a Plan of Operations. Our next step will be to prepare an Environmental Assessment (EA) on the plan. An EA is a document where we address the environmental concerns which may be created by mining. For this EA we will address a mine at the scale of your proposed early phase. We will also assume that you will be mining about 1 ton of ore per week and hauling it off site for milling. We will assume that the cabin will be the only facility which you will need to maintain on the claim and that you will use the existing roads and ways for access. We will also assume that your mining will be confined to the areas which have already been disturbed. Please let us know if any of our assumptions are in error.

We will need an additional 60 days to complete the EA process. We should complete our review of the plan by May 4, 1991. We are returning your photographs to you as you requested. Should you have any questions regarding this letter or our EA process, please feel free to call Phil Allard at (801) 743-6811.

Sincerely,

Dave Henderson  
Area Manager

Enclosure  
Photos

PA11and:mso:0024E

PA11and 2/28/91

Bureau of Land Management  
RECEIVED

Paul Buhanan  
P.O. Box 157  
Cedar City, Ut.  
84720

FEB 06 1991

Date 2/4/91

Bureau Of Land Managment  
Dave Henderson  
15 Ea. 500 So.  
Fillmore, Utah  
84631

Ward Springs Act.	INFO	ACTION	FILED
Phil	✓	✓	✓
House Range Act.	_____	_____	_____
_____	_____	_____	_____
Operations Division	_____	_____	_____

Refer to: 3800  
UT055

Dear Dave:

I am writing in reply to your letter. ~~FLS~~ The Cabin located at my claim site is in fact used in conjunction with my mining operations. I use it as a testing laboratory, and also as a shelter when I go out to work at the mine. I usually stay for a week or two at a time when I go out to work. It shelters me then. Also there are some kinds of testing that can be done there. At those times I use it as a lab. You can see that in the enclosed photo. You may have also noticed the furnace outside the cabin. That was an experiment in mercury volatilization / distillation. Well it didn't work out. The cabin was built by my Grandfather and uncle Wane Behunin. I have made improvements on it and it is certainly a part of working out there and surviving. The desert can be hard if one isn't prepared. There is no doubt that the cabin was there a long time before you thought of calling the area wilderness study. Back In 1975-1976 there was quite a bit of excitement about the claims out there. George D. Ferh had gotten together about a million dollars from some investors and they wanted to lease the property and mine the ore. At that time we made road improvements and started to get a milling operation going in Delta. It was then that Wane made some kind of deal with the county for road maintenance. I hope you feel like leaving that deal in place. It was our intention to ship 20-35 tons of ore per day for milling. If you are interested, I do have papers that document that fact. Well, now George is long gone I think. It is now my intention to continue testing (so far sometimes I get good gold and sometimes I lose it. It is a complex one) and when I find a consistent process for getting it out, I intend to dig and process ore. I think I will probably ship the ore to Delta or some other city with power and water for processing. Since there is no power or water out there, milling would be difficult. It's hard to know just how much would be feasible to handle. Now to me, it seems 20-35 tons a day is an awful lot. I think it would take some time to work up to that kind of quantity. My recent testing is going good, I have an idea I think might just solve the puzzle. If it works out, I will probably be in the first stages of production by this summer; but on a much smaller scale than 35 tons/day. I think possibly a pickup load every 2 or three weeks. I will work with you in every way I can. I do support environment protection and will conduct mining in such a way as to be the least damaging to the environment. It is my intention to work closely with you on those kinds of matters. I hope this letter clarifies my position

050 - 91 - 062 EA

to you. If it is not sufficient, let me know what else you need and I'll see if I can do it. This letter should confirm that:

1. It is an active valid mining claim
2. It has grandfathered rights which apply to it
3. I intend to get it producing values and patent it.
4. The cabin is a part of my mining operation
5. I will comply with the laws regarding the development of said claims

Well, I don't know what else to say to you at this time. I'm just a country boy, not given to lawyer talk. I do pretty well with plain simple truth. This letter is that. If you need more let me know.

Oh I would like you to return the photos.

*Sincerely*

*Paul Graham*